

LETTER FROM COUNSEL

FILED BY:

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March 21, 2012

Hon. Michael A. Shipp
United States District Court
Martin Luther King Jr. Federal Bldg. 50 Walnut Street
Newark, NJ 07101

Re: White v. Smiths Detection, Inc.
Docket No. 2:10-cv-04078-SRC/MAS

Dear Judge Shipp:

This is a joint letter from all counsel. The parties are to appear before Your Honor on March 30, 2012 for a settlement conference, with our settlement proposals due to the court in two days, Friday, March 23, 2012. We are writing to request leave of court to suspend these settlement proceedings and extend the Discovery End Date so that the parties may mediate the case with Hon. John Bissell on March 30, 2012.

The parties agree that mediation may be fruitful now. Wishing to use the March 30th meeting to best advantage, we agreed to consider mediation with Judge Bissell because he is able to dedicate the entire day to work toward a settlement. We contacted Judge Bissell, and he is available and willing accept the same schedule Your Honor established, with their position statements to Judge Bissell on March 23, 2012 and mediation on March 30, 2012.

We respectfully request that the court postpone the court's March 30th settlement conference and suspend the discovery period which is ending on May 7, 2012 for at least two weeks, pending mediation with Judge Bissell. We are grateful for your consideration.

Respectfully submitted,
Law Office of Ellen O'Connell, L.L.C.

Respectfully submitted,
Morgan Lewis

By: s/Ellen O'Connell
Ellen O'Connell
Debevoise Plimpton

By: s/W. John Lee
W. John Lee

By: s/Jyotin Hamid
Jyotin Hamid

So Ordered this 22nd day
of March, 2012
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